

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TIMOTHY F.L. HAYES, a resident of)
The United Kingdom)
)
Plaintiff,)
)
v.) Case No. 08 C 632
)
FIRST CHICAGO MORTGAGE CO., an)
Illinois corporation, JASON J. LAMBERT, an)
Illinois resident, KROLL FACTUAL DATA)
CORPORATION, a Colorado corporation,)
JOHN DOES 1-5, and ABC)
CORPORATIONS 1-5,)
)
Defendants.)

**DEFENDANT KROLL FACTUAL DATA CORPORATION'S MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, KROLL FACTUAL DATA CORPORATION, by and through their undersigned counsel, Freeborn & Peters LLP, hereby submit their Motion for Extension of Time to Answer or Otherwise Plead, and in support thereof, states as follows:

1. Plaintiff filed their Complaint (the "Complaint") in this Court on January 29, 2008.
2. On February 29, 2008, Freeborn & Peters LLP accepted service on behalf of Defendant Kroll Factual Data Corporation. Defendant Kroll Factual Data Corporation requires additional days to finalize its Answer or otherwise respond to the Complaint.
3. Defendant Kroll Factual Data Corporation seeks 20 days (on or before March 20, 2008) to Answer or otherwise respond to the Complaint.

4. Plaintiff's counsel has informed Defendant Kroll Factual Data Corporation's counsel that they have no opposition to this motion.

WHEREFORE, Defendant KROLL FACTUAL DATA CORPORATION, respectfully request that this Court grant its Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint, and allow Defendant KROLL DATA CORPORATION until March 20, 2008 to file their Answer or otherwise respond to the Complaint.

Respectfully submitted,

KROLL FACTUAL DATA CORPORATION

BY: /s/ Michael S. Mayer
One of Its Attorneys

Steven P. Gomberg (#1004204)
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311 S. Wacker Drive, Suite 3000
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Counsel for Defendant Kroll Factual Data Corporation

Dated: February 29, 2008

CERTIFICATE OF SERVICE

I hereby certify that on February 29, 2008, I electronically filed **Kroll Factual Data Corporation's Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Alexander Holmes Burke
Keith J. Keogh
Law Offices of Keigh J. Keogh, Ltd.
227 West Monroe Street
Suite 20000
Chicago, IL 60606

Respectfully Submitted,

BY: /s/ Michael S. Mayer
Michael S. Mayer

Dated: February 29, 2008

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